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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FREIDA PRIES,
Plaintiff,
v.
JO ANNE B. BARNHART,
Commissioner of Social Security,
Defendant.

} CIVIL NO. 05-01431 NJV
}
} STIPULATION AND ORDER EXTENDING
} DEFENDANT'S TIME TO FILE
} RESPONSE TO PLAINTIFF'S
} MOTION FOR SUMMARY JUDGMENT

IT IS HEREBY STIPULATED by and between the undersigned attorneys, subject to the approval of the Court, that defendant Commissioner may have an extension of 30 days in which to file her response to plaintiff's motion for summary judgment.¹ Defendant's response was due on July 17, 2006, pursuant to Civil L.R.16-5. Defendant's response is now due on August 16, 2006.

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¹ See attached Declaration of Theophous H. Reagans..

1 This is defendant's first request.
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5 Dated: July 13, 2006

/s/
6 KENNETH J. COLLINS
Attorney for Plaintiff

7 KEVIN V. RYAN
8 United States Attorney

12 Dated: July 17, 2006

By: /s/
13 SARA WINSLOW
Assistant United States Attorney

14 PURSUANT TO STIPULATION, IT IS SO ORDERED:
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19 Dated: 7/17/06



20 NANDOR J. VADAS
United States Magistrate Judge

KEVIN V. RYAN, CSBN 118321
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DECLARATION OF THEOPHOUS H.
REAGANS IN SUPPORT OF DEFENDANT'S
REQUEST FOR EXTENSION OF TIME

I, Theophous H. Reagans, declare and state as follows:

1. I am an Assistant Regional Counsel in the Office of the General Counsel for the United States Social Security Administration (“SSA”), Region IX.

2. I am requesting a 30-day extension for filing Defendant Commissioner's response to Plaintiff's motion for summary judgment in order to provide further opportunity for review and analysis of this case.

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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.
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3 Executed in San Francisco, California on July 12, 2006.

4 By /s/
5 THEOPHOUS H. REAGANS
6 Assistant Regional Counsel
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